

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

MONIQUE TYSON,
[DOB: 11/16/1965]

Defendant.

No. _____

COUNT ONE:
29 U.S.C. § 439(c)
**(Falsification of Financial Records Kept by
Labor Union)**

NMT: 1 Year Imprisonment

NMT: \$10,000 Fine

NMT: 1 Year Supervised Release

Class A Misdemeanor

\$100 Mandatory Special Assessment

Order of Restitution

INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to these charges:

1. Monique Tyson was a resident of Jackson County, Missouri and employed as the secretary for the Painters District Council 3 labor union in Raytown, Missouri.
2. The Painters District Council 3 was a labor organization engaged in an industry affecting commerce and subject to the Labor Management Reporting and Disclosure Act of 1959, Title 29 U.S.C. § 401, et seq.
3. Between January 2012 and July 2013, Tyson, as secretary for the union, took cash initiation fees paid by union members for her personal use. Tyson did not record the cash payments of initiation fees in the cash receipts journal, and in fact, falsified the entries in the cash receipts journal to hide her embezzlement. Tyson kept a separate receipt journal to record the payments she embezzled, and did not disclose this receipt book to the union executive board or leaders.

4. Tyson stole a total of between \$7,500 and \$20,864 from the union.

COUNT ONE

5. The allegations in paragraphs One through Four are realleged and incorporated herein by reference.

6. From on or about January 1, 2012, to July 2013, in the Western District of Missouri, the defendant Monique Tyson did willfully make false entries in the cash receipts journal of the union by not entering the cash payments she kept for her personal use, nor the receipts she gave union members. The cash receipts journal was a record required to be kept by Section 436 of Title 29, a record on matters required to be reported in the annual financial report of Painters District Council 3, which was required to be filed with the Secretary of Labor for such labor organization's fiscal year ending on December 31, 2013.

All in violation of Title 29, United States Code, Section 439(c).

Respectfully submitted,

Tammy Dickinson
United States Attorney

By */s/ Kathleen D. Mahoney*

Kathleen D. Mahoney
Assistant United States Attorney

Dated: January 19, 2017